

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: Alexander E. Jones Debtor	§ § § § §	Chapter 11 Case No. 22–33553 (CML)
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**TEXAS PLAINTIFFS’ NOTICE OF RULE 2004 DEPOSITION OF
ERIKA WULFF-JONES**

To: Erika Wulff-Jones, by and through her counsel of record, Melissa Kingston, Friedman & Feiger, LLP, 17304 Preston Road, Suite 300, Dallas, TX 75252.

Please take notice that, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Rule 2004-1 of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), the Texas Plaintiffs Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine will take the oral deposition of Erika Wulff-Jones. The deposition will commence on July 14, 2023, at 10:00 a.m. Central Time at Jackson Walker LLP, 100 Congress Avenue, Suite 1100, Austin, TX 78701, or at such other date, time and place as the parties may agree.

Please be advised that the scope of the deposition includes, but is not limited to, any matter relevant to: (i) any Document¹ produced in response to any discovery request in this case or in the FSS Case, including any banking records and transaction Documents; (ii) the Debtor’s Assets, liabilities, and financial condition; (iii) any Payments, Transfers, Gifts, or distributions of any Assets involving the Debtor or his entities, directly or indirectly; (iv) any agreements or contracts between You and the Debtor concerning

¹Capitalized terms undefined herein have the meaning ascribed to them in the *Notice of the Official Committee of Unsecured Creditors’ Bankruptcy Rule 2004 Examination of Erika Wulff Jones* [ECF No. 251].

any Assets; (v) any plan that may be introduced in the Debtor's bankruptcy or in the FSS Case, insofar as it concerns the Debtor; and (vi) any topics covered in the *Subchapter V Trustee's Initial Findings of Free Speech Systems, LLC Investigation* filed on the docket in the FSS Case at ECF Nos. 549 and 550, and the supplement thereto filed at ECF Nos. 573 and 574.

Dated: July 6, 2023

Respectfully submitted,

MCDOWELL HETHERINGTON LLP

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Counsel for Texas Plaintiffs

CERTIFICATE OF SERVICE

I certify that on July 6, 2023, a true and correct copy of the foregoing was served on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Avi Moshenberg

Avi Moshenberg